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Co-Lead/Liaison Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

**IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION**

MD No. 02641

**NOTICE OF SUBMISSION OF
PROPOSED CASE MANAGEMENT
ORDER RE RULES, POLICIES,
PROCEDURES, AND GUIDELINES
RELATING TO ESTABLISHING
COMMON BENEFIT FEE AND
EXPENSE FUND**

In accordance with this Court's Case Management Order No. 2, Plaintiffs' Co-Lead/Liaison Counsel submit a proposed form of case management order to address rules, policies, procedures, and guidelines relating to establishing common benefit fee and expense fund.

DATED this 6th day of November, 2015.

GALLAGHER & KENNEDY, P.A.

By: /s/ Robert W. Boatman

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Co-Lead/Liaison Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of November 2015, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Nancy Jo Koenes

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